

U.S. Magistrate Judge S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
JADE ALEXANDER BEAVIN
Defendant.

CASE NO. MJ22-276

COMPLAINT for VIOLATION
18 U.S.C. § 922(g)(1)

BEFORE United States Magistrate Judge S. Kate Vaughan, United States
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Unlawful Possession of a Firearm)

On or about January 24, 2020, in Snohomish County, within the Western District
of Washington, JADE ALEXANDER BEAVIN, knowing he had been convicted of the
following crimes punishable by a term of imprisonment exceeding one year:

- i. *Residential Burglary, Residential Burglary, Second Degree Taking a Motor
Vehicle Without Permission, Bail Jumping, in Snohomish County Superior
Court, dated May 7, 2018, under cause number 16-1-01372-31;*

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, that
is:

COMPLAINT/ JADE ALEXANDER BEAVIN - 1
USAO NO. 2022R000652

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 One silver Rossi revolver;
2 which had been shipped and transported in interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Section 922(g)(1).

4 And the complainant states that this Complaint is based on the following
5 information:

6 I, Oliver H. Cunningham, being first duly sworn on oath, depose and say:

7 **INTRODUCTION AND AFFIANT BACKGROUND**

8 1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and
9 have been so employed since January 2021. I presently am assigned to work at the
10 Seattle Headquarters office. I am currently assigned to the Safe Streets Task Force and
11 am responsible for investigating violent gangs, with an emphasis on gangs, and work a
12 variety of criminal violations, including the investigation of violent crimes. Moreover, I
13 am a federal law enforcement officer who is engaged in enforcing criminal laws and am
14 authorized by the Attorney General to request search warrants, court orders, and other
15 legal processes.

16 2. I am a graduate of the Federal Bureau of Investigation Basic Field Training
17 Course. During this 21-week training, I received training in interviewing and
18 interrogation techniques; arrest procedures; search and seizure; and surveillance
19 techniques. Prior to this employment, I obtained a Bachelor of Arts in Spanish and
20 Government and Legal Studies and a Masters of Arts in International Relations. I have
21 five years' experience working in non-profit organizations in international development
22 and four years' experience managing projects and programs for private companies.

23 3. As a Special Agent of the FBI, I have actively participated in investigations
24 of criminal activity, including but not limited to investigations of drug trafficking. During
25 these investigations, I have participated in the execution of search warrants and the
26 seizure of evidence, including evidence related to drug trafficking activities. As a result
27 of my training and experience, I have an understanding of the manner in which narcotics
28 are distributed and various roles played by individuals or groups involved in the

1 distribution. I am also familiar with the role of drug distribution in furtherance of gang
2 activity.

3 4. I also have been involved in several drug investigations and Organized
4 Crime Drug Enforcement Task Force (OCDETF) investigations involving cocaine,
5 heroin, marijuana and methamphetamine trafficking organizations.

6 5. As a result of my training and experience, I have an understanding of the
7 manner in which narcotics are distributed and various roles played by individuals or
8 groups involved in the distribution, along with the unlawful use of firearms during crimes
9 of violence and/or drug trafficking and firearms trafficking.

10 6. Through my training and experience, I have encountered and become
11 familiar with various tools, methods, trends, paraphernalia and related articles utilized by
12 various traffickers in their efforts to import, export, conceal and distribute controlled
13 substances. I am also familiar with the manner in which drug traffickers use telephones,
14 often cellular telephones, to conduct their unlawful operations, and how they code their
15 conversations to disguise their unlawful activities.

16 7. I know from my training and experience that individuals involved in the
17 trafficking of controlled substances often maintain possession and control of firearms in
18 an attempt to protect themselves and their illegal trafficking enterprise (that is, both their
19 drugs and drug proceeds). Furthermore, narcotics traffickers will utilize those firearms as
20 a means to intimidate or ensure the loyalty of their associates and/or subordinates and to
21 prevent those with intimate knowledge of the organization from disclosing information to
22 law enforcement.

23 8. The facts in this affidavit come from my own personal knowledge and
24 observations; my training and experience; information obtained from other agents; review
25 of documents and records related to this investigation; and communications with others
26 who have personal knowledge of the events and circumstances described herein. This
27 affidavit is intended to show merely that there is sufficient probable cause for the
28

1 requested Complaint, and therefore does not set forth all of my knowledge about this
2 matter.

3 **SUMMARY OF PROBABLE CAUSE**

4 9. On or about January 24, 2020, at approximately 5:15 p.m. Everett Police
5 Officers observed BEAVIN driving a silver 2008 Dodge Avenger bearing Washington
6 license plate BPK5086. BEAVIN had an active Department of Corrections warrant at the
7 time. Additionally, Everett officers had information provided by the Marysville Police
8 Department that BEAVIN was armed with a firearm. BEAVIN was stopped and taken
9 into custody without incident. The arresting officers asked BEAVIN if he dealt narcotics
10 and BEAVIN admitted dealing "brown to supplement his income." Based on my training
11 and experience I know that brown is a common street term for heroin.


12 10. BEAVIN admitted to Everett Police Officers that the car had about .5 gram
13 of heroin in a black backpack. Snohomish County Superior Court approved a search
14 warrant for BEAVIN's vehicle. Inside BEAVIN's black backpack officers located a
15 Rossi revolver bearing serial number W266140. A records check of the Rossi revolver
16 revealed no record associated with the firearm.

17 11. In the front zip pocket of the backpack officers located a small black
18 container. On the front portion of the black zip container there were approximately 15
19 unused zip lock baggies associated with packaging narcotic, a digital scale with brown
20 residue on it, and a glass container with a cork top inside. The glass container housed two
21 separately packaged brown substances. Officers conducted a NIK test that established the
22 substance was heroin. The weight for one of the packages was 1.95g and the other was
23 1.30g for a total of 3.25g.

24 12. I have reviewed Snohomish County Judgement and Sentence 16-1-01372-
25 31 which documents that on May 7, 2018, JADE ALEXANDER BEAVIN was sentenced
26 to a combined total of fifty-three months in prison following convictions for two counts
27 of Residential Burglary, one count of Second Degree Taking a Motor Vehicle Without
28 Permission, and one count of Bail Jumping.

1 13. On June 17, 2022, Bureau of Alcohol, Tobacco, Firearms and Explosives
 2 (ATF) Special Agent (SA) Catherine Cole, a certified Interstate Firearms and
 3 Ammunition Nexus Expert, who has been trained in the recognition of firearms and
 4 ammunition and their origin of manufacture, examined photos of the Rossi, Model 88,
 5 .38 Special caliber revolver, with serial number W266140.

6 14. Based on the photos, SA Cole determined that the above-identified Rossi,
 7 Model 88, .38 Special caliber revolver, with serial number W266140, was not
 8 manufactured in the state of Washington. Based upon her experience, knowledge, and
 9 research, it is also SA Cole's opinion that the above-listed firearm meets the definition of
 10 a firearm under Title 18, United States Code, Section 921(a)(3). Furthermore, it is also
 11 SA Cole's opinion that, because the above-listed firearm was not manufactured in the
 12 state of Washington, it therefore must have traveled in interstate commerce if it was
 13 received or possessed in the state of Washington.

14
 15 
 16 OLIVER H CUNNINGHAM,
 17 Complainant
 18 Special Agent, FBI

19 The above-named Special Agent provided a sworn statement attesting to the truth
 20 of the foregoing by telephone on the 22nd day of June, 2022. Based on the Complaint
 21 and Affidavit sworn to before me, the Court hereby finds that there is probable cause to
 22 believe the defendant committed the offense set forth in the Complaint.

23 Dated this 22nd day of June, 2022.

24
 25 
 26 S. KATE VAUGHAN
 27 United States Magistrate Judge
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